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Attorneys for Defendants

**UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)
SIPA LIQUIDATION
(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

ESTATE OF JAMES M. GOODMAN; and
AUDREY GOODMAN, individually, and in her
capacity as Personal Representative of the Estate of
James M. Goodman,

Defendants.

Adv. Pro No. 10-05079 (SMB)

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT OF DEFENDANTS'
MOTION TO WITHDRAW THE REFERENCE**

HELEN DAVIS CHAITMAN hereby declares, under penalty of perjury pursuant to 28
U.S.C. § 1746, as follows:

1. I am a member of the bars of New York and New Jersey, and of this Court. I am a member of Chaitman LLP, counsel for Defendants, Estate of James M. Goodman and Audrey Goodman, individually, and in her capacity as Personal Representative of the Estate of James M. Goodman (“Defendants”).

2. I submit this Declaration in support of Defendants’ motion to withdraw the reference pursuant to 28 U.S.C. § 157(d) and Rule 5011 of the Federal Rules of Bankruptcy Procedure.

3. Attached hereto as **Exhibit A** is a true and accurate copy of the Complaint filed by the Trustee, dated December 2, 2010 [ECF No. 1].

4. Attached hereto as **Exhibit B** is a true and accurate copy of Defendants’ Answer and Affirmative Defenses, dated August 13, 2015 [ECF No. 40].

Dated: New York, New York
February 25, 2021

/s/ Helen Davis Chaitman
Helen Davis Chaitman